

Exhibit A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 23-10063 (SHL)
)
) (Jointly Administered)
)

**ORDER GRANTING THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS'
MOTION FOR ENTRY OF AN ORDER REQUIRING THE REDACTION
OF CERTAIN PERSONALLY IDENTIFIABLE INFORMATION**

Upon the motion (the “**Motion**”)² of the Official Committee of Unsecured Creditors (the “**Committee**”) appointed in the cases of the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”), pursuant to sections 107(b) and (c) of the Bankruptcy Code and Bankruptcy Rule 9018, for entry of an order requiring the Debtors to redact Confidential Information from their Schedules and Statements; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and the Standing Order; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157 and 1334(b)(2) and the Standing Order; and the Court having found that it may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and the Court having found that notice of the Motion and opportunity

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); and Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these chapter 11 cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

for a hearing on the Motion was appropriate under the circumstances and no other notice need be provided; and the Court having reviewed the Motion; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor:

IT IS HEREBY ORDERED THAT:

1. The Motion is granted to the extent set forth herein.
2. The Debtors are hereby authorized and directed, pursuant to sections 107(b) and (c) and 105(a) of the Bankruptcy Code and Bankruptcy Rules 1007 and 9018, to redact the Confidential Information of (i) individual creditors as well as (ii) institutional creditors, from (x) the Schedules and Statements and (y) any other document or paper the Debtors have filed or will file in these chapter 11 cases.
3. All parties in interest are hereby authorized and directed, pursuant to sections 107(b) and (c) and 105(a) of the Bankruptcy Code, to redact the Confidential Information of (i) individual creditors as well as (ii) institutional creditors, from any document or paper such parties in interest have filed or will file in these chapter 11 cases.
4. The Debtors shall provide unredacted copies of the Schedules and Statements and any other documents redacted pursuant to this Order to (i) the Court, (ii) the U.S. Trustee, (iii) the Committee, (iv) counsel to the Ad Hoc Group of Genesis Lenders (on a confidential and professional eyes only basis), and (v) any other party as may be ordered by the Court or agreed to by the Debtors and the Committee, in each case under appropriate confidentiality agreements reasonably satisfactory to the Debtors and the Committee.

5. The Debtors shall submit unredacted copies of the Schedules and Statements, and the Debtors or any party in interest, as applicable, shall submit unredacted copies of any other document or paper redacted pursuant to this Order, to the Clerk of the Court under seal in an envelope, clearly indicating that the same has been filed under seal by order of this Court and may not be unsealed until and unless permitted by further order of this Court.

6. Notwithstanding any provision in the Bankruptcy Rules to the contrary, (i) the terms of this Order shall be immediately effective and enforceable upon its entirety; and (ii) the Debtors are not subject to any stay in implementation, enforcement, or realization of the relief granted in this Order.

7. This Court shall retain exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____

The Honorable Sean H. Lane
United States Bankruptcy Judge